

**IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA**

**IN THE MATTER OF:**

**PAUL HANSMEIER**

**CHAPTER 13 CASE NO. 15-42460**

**DEBTORS**

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**NOTICE OF HEARING AND MOTION ON OBJECTION TO PROOFS OF CLAIM  
FILED BY CREDITORS PAUL GODFREAD AND ALAN COOPER**

To: The Chapter 13 Trustee, The U.S. Trustee, and the other entities specified in Local Rule 9013-3.

1. The Debtor moves the court for the relief requested below and give notice of hearing.
2. The court will hold a hearing on this motion at 11:30 AM on December 17, 2015, before The Honorable Kathleen H. Sanberg, United States Bankruptcy Court, Courtroom 8 West, 300 S. 4th Street, Mpls, MN 55415.
3. Any response to this Motion must be filed and delivered not later than December 10, 2015 which is five days before the date set for the hearing.
4. This court has jurisdiction over this Motion pursuant to 28 U.S.C. Section 157, and Section 1334, Bankruptcy Rule 5005. This proceeding is a core proceeding. The petition commencing this Chapter 13 case was filed on July 13, 2015.
5. This Motion arises under 11 U.S.C. Section 1329, and Bankruptcy Rule 3007. This Motion is filed under Bankruptcy Rule 9014 and Local Rules 9001 et seq.
6. Paul Godfread filed a claim in the amount of \$678865.97 as claim number 9-1.
7. Alan Cooper filed an identical claim as claim number 10.
8. Debtor has no obligation on either of these claims. On February 3, 2014, Godfread and Cooper obtained an attorneys fees sanction against Prenda Law and Paul Duffy. Debtor was never named as a party or served with process with regard to the underlying suit.
9. On October 10, 2014, Godfread and Cooper brought a motion in federal court, the U.S. District of Illinois, seeking to impose liabilities entered in the case against Prenda Law, Inc, on Debtor. See Motion to impose Liabilities of Prenda Law, Inc. upon John Steele, Paul Hansmeier and Paul Duffy, jointly and severally, Prenda Law, Inc., No. 12 CV 1569 (ND Ill.) Dkt. No. 66.
10. The Honorable U.S. District Court Judge John W. Darrah of the U.S. District Court fo the District of Illinois denied the above motion and found as a matter of law that Debtor could NOT be held liable for any of the liabilities of Prenda Law, Inc., in the case. A

copy of the order is attached as an exhibit to this motion. See court order dated April 9, 2015.

11 The issue of Debtor's liability to Godfread and Cooper has been fully and finally resolved in Debtor's favor. The court's order is binding on this court and precludes Godfread and Cooper from relitigating the issue

12. The debtor therefore objects to the filing of the said Proofs of Claim.

**WHEREFORE**, the debtor prays of the Court as follows:

A. That the Court direct the Chapter 13 Trustee to strike the claim 9-1 and 10 of the Paul Godfread and Alan Cooper.

B. That the debtor have such other and further relief as the Court may deem just and proper.

This the 16th day of November, 2015.

/e/ Barbara J. May  
Attorney At Law  
Barbara J. May  
2780 N. Snelling #102  
Roseville, MN 55113  
651-486-8887  
Attorney Reg 129689

**CERTIFICATE OF SERVICE**

Attorney, hereby certifies to the Court as follows, under penalty of perjury, that she has this day served a copy of the foregoing **NOTICE OF HEARING, MOTION, MEMORANDUM, PROPOSED ORDER** on all parties in interest by electronic notification as follows:

U.S. Trustee  
1015 U.S. Courthouse  
300 South 4th Street  
Minneapolis, MN 55415

Gregory Burell  
310 Plymouth Building  
12 South 6th Street  
Minneapolis, MN 55415

Paul Godfread  
c/o Booth Sweet LLP  
32R Essex Street  
Cambridge, MA 02139

Alan Cooper  
c/o Booth Sweet LLP  
32R Essex Street  
Cambridge, MA 02139

Also by US Mail

Dated this the 14th day of November, 2015

/e/ Barbara J. May  
Attorney for Debtors

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT MINNESOTA**

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DISTRICT OF MINNESOTA**

**IN THE MATTER OF:**

**PAUL HANSMEIER**

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In Minneapolis, Minnesota on December 17, 2015

This matter came before the undersigned Judge of the United States Bankruptcy Court for the District of Minnesota, pursuant to the objection to the claims 9-1 and 10 of Paul Godfread and Alan Cooper; and all appearances being noted on the record, this court now makes the following ORDER:

- 1 The Debtor's motion is granted,
- 2 Claims 9-1 and 10 are stricken.

IT IS THEREFORE SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
The Honorable Kathleen H. Sanberg  
Judge of Bankruptcy Court

